

**UNITED STATE BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:
Mary Strecker

(Debtor)

)
)
) Chapter 13
)
) 08-48385
)

**MOTION BY DEBTOR TO CONVERT CASE UNDER CHAPTER 7 TO CASE
UNDER CHAPTER 13**

COMES NOW, Douglas M. Heagler, attorney for Debtor, and pursuant 11 U.S.C. Sect 1307(a), the above named Debtor requests this Court to convert her case under Chapter 13 to a case under Chapter 7, and as grounds states as follows:

1. Debtor is eligible to be a Debtor under Chapter 7 of the Code and desires to convert this case to a case under that chapter 13.
2. Debtor has had a reduction in her work hours, and now has a dependent so that her household size has increased.
3. Debtor is filing an amended B22 along with this motion.
4. The Trustee currently has a motion to dismiss for failure to make plan payments.

WHEREFORE, the Debtor prays for this Court to convert this case under Chapter 13 to a case under Chapter 7 of the bankruptcy code.

Respectfully submitted,

The Law Office of Douglas M. Heagler

/s/ Douglas M. Heagler #115112, #48952
Attorney for Debtor
901 Boones Lick, Ste. 1W
St. Charles, MO 63301
636 278 2778
dheagler@freshstartbk.com

CERTIFICATE OF SERVICE

I certify that a copy of the attached pleading was served either electronically (via ECF) or via U.S. Mail on May 9, 2011 to the following parties:

John V. LaBarge, Jr.
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Office of the United States Trustee
111 S. 10th Street, Ste. 6353
St. Louis, MO 63143

Mary Strecker
3601 Arlington Dr.
St. Louis, MO 63303

Attached List

/s/ Douglas M. Heagler
Douglas M. Heagler, Fed #48952
901 Booneslick
St. Charles, MO 63301
(636) 278-2778
dheagler@freshstartbk.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

IN RE: **Mary Strecker**

CASE NO. **08-48385**

CHAPTER **13**

Certificate of Service

I, the undersigned, do hereby certify that I served a copy of this Debtor's Motion to Convert was served upon the parties listed on the service list, by causing the same to be mailed in a properly addressed envelope, postage prepaid, on or before May 9, 2011.

American Express
xxxxxxxxxxxxxx2453
c/o Becket and Lee
PO Box 3001
Malvern, PA 19355

Discover Financial
xxxxxxx5470
Attention: Bankruptcy Department
PO Box 3025
New Albany, OH 43054

Unifund
xxxxxxxxxxxx0386
Attention: Bankruptcy
10625 Techwoods Circle
Cincinnati, OH 45242

Bank Of America
81
NC4-105-03-14
4161 Piedmont Pkwy
Greensboro, NC 27420

Kohls
xxxxxxx6652
Attn: Recovery
PO Box 3120
Milwaukee, WI 53201

Chase
900 Stewart Ave
Garden City, NY 11530

Missouri Department of Revenue
Bankruptcy Unit
P.O. Box 475
301 W. High Street
Jefferson City, MO 65105-0475

Chase
xxxx
800 Brooksedge Blvd
Westerville, OH 43081

Phillips and Burns LLC
xxxx-xxxx-xxxx-4970
461 Ellicot St.
3rd Floor
Buffalo, NY 14203

Citi
xxxxxxxx4747
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64915

SSM
Patient Accounts
1015 Corporate Square Drive
St. Louis, MO 63132

Credit First
xxxxx6764
PO Box 818011
Cleveland, OH 44181

St. Charles County Ambulance Dist.
xxxx
4169 Old Mill Parkway
St. Peters, MO 63376